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August 23, 2005

Federal Communications Commission
Office of Secretary

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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**Re: Comtel Telecom Assets LP, Comtel Virginia LLC, VarTec Telecom, Inc.,
Excel Telecommunications, Inc. and VarTec Solutions, Inc., Joint
International and Domestic Application for Consent to Transfer of Assets
and Assignment of Authorization**

**WC Docket No. 05-260; File Nos. ITC-ASG-20050804-00305; ITC-ASG-
20050804-00306; ITC-ASG-20050805-00307**

***Submission of Additional Information in Accordance with Section 1.65 of the
Commission's Rules***

Dear Ms. Dortch:

On August 4, 2005, the Applicants filed the above captioned Joint International and Domestic Application for Authority pursuant to Section 214 of the Communications Act of 1934, as amended (the "Act"). Although the facts submitted in the Application remain true and correct, in order to update the record pursuant to Section 1.65 of the Commission's rules, Comtel Telecom Assets LP and Comtel Virginia LLC (collectively, "Comtel") provide the following information:

Subsequent to the Applicants filing the above referenced Application, Mercantel Communications, L.P. ("Mercantel"), an affiliate of Comtel, submitted an application to provide international telecommunications services under Section 214 of the Act, which is currently pending.¹ Mercantel currently has no telecommunications services customers.

As explained in Mercantel's application, Mercantel is 2% owned by its general partner, Mercomm Management LLC ("Mercomm"), a Texas limited liability company, which in turn is 85% owned by Comtel Investments LLC ("Comtel Investments"), a Delaware limited liability

¹ *Streamlined International Section 214 Application Accepted for Filing*, Public Notice, File No. ITC-214-20050809-00311 (rel. Aug. 12, 2005)

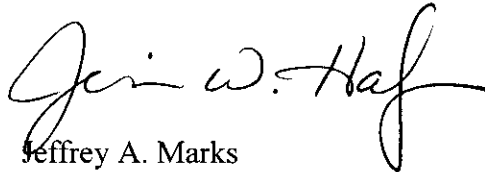
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company. In addition to its indirect interest in Mercantel, Comtel Investments also holds a direct 83.3% limited partnership interest in Mercantel. Comtel Investments is 100% owned by Sowood Commodity Partners Fund III LP ("Sowood Fund III"), a Delaware limited partnership. Thus, Mercantel and Comtel are affiliates due to Sowood Fund III's substantial indirect equity interests in each company.²

If you have any questions, please contact the undersigned at (202) 637-2200.

Respectfully submitted,



Jeffrey A. Marks
Jessica W. Hafer*

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Virginia LLC*

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cc: Jodi Cooper, International Bureau
Renee Crittendon, Wireline Competition Bureau
Tracey Wilson Parker, Wireline Competition Bureau

² Despite their similar names, Comtel Investments does not have an ownership interest in Comtel.